

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO

In re: Angel Fire Water Co., LLC
Foreign Limited Liability Company
EIN: 88-0489298,

Debtor.

No. 13-10868-t11


DEBTOR'S OBJECTION TO JON COX'S PROOF OF INTEREST FILED
AUGUST 26, 2013 (Proof of Interest #12)

COMES NOW the Debtor, Angel Fire Water Co., LLC., through its counsel, William F. Davis & Assoc., P.C. (William F. Davis, Esq. and Andrea D. Steiling, Esq.), hereby objects to allowance of the proof of interest of Jon Cox ("Cox") as set forth in Proof of Interest No. 12 filed herein (the "Proof of Interest"). For its Objection, the Debtor states:

1. Debtor filed for relief under Chapter 11 of the United States Bankruptcy Code on March 15, 2013 and is operating as a Debtor in Possession.
2. Cox filed his Proof of Interest on August 26, 2013. He claims a 5% membership in the Debtor by way of an undated hand written attachment. (Proof of Interest No. 12).
3. Debtors' disputes the equity interest in the amount of 5% in the Debtor, or any percent in the Debtor that is claimed by Cox.
4. The Debtor never gave a member interest to Cox.
5. No member interest as was ever recorded with the Secretary of State as stated in the Proof of Interest attachment.
6. Debtor alleges that the letter attached to the Proof of Interest is a rough draft and was taken from the managing member's possession without permission or completion.


7. Debtor and Cox had engaged in some discussion wherein Cox would obtain an interest in the Debtor based upon his bringing in \$50,000 a month in new sales separate of those sales previously established by the managing member.
8. Cox was never able to provide the \$50,000 a month in new sales and the agreement was never finalized.
9. Debtor asserts that the letter attached to the Proof of Interest is merely ideas and thoughts and was never placed into a contract; was not signed by the parties or notarized.

WHEREFORE, the Debtor moves this Court to deny the Jon Cox Proof of Interest in its entirety and for any further relief as the Court deems just.

Respectfully submitted:
WILLIAM F. DAVIS & ASSOCIATES, P.C.
/s/ Electronically filed on 10/2/13
William F. Davis, Esq. 
Andrea D. Steiling, Esq.
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This certifies that on October 2, 2013,
service of this document was made on all parties
entitled to notice by and via the notice transmission
facilities of the CM/ECF system of the Bankruptcy Court
and those listed below:

Jon Cox
c/o Law Office of George "Dave" Giddens, PC
10400 Academy Blvd NE, Suite 350
Albuquerque, NM 87111

/s/ 10/2/13
William F. Davis, Esq. 

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